

1 Brent T. Robinson
 2 LING & ROBINSON
 3 Attorneys at Law
 4 P. O. Box 396
 5 Rupert, Idaho 83350
 6 Telephone No. (208) 436-4717
 7 Fax No. (208) 436-6804
 8 Attorneys for Debtors

U.S. COURTS

01 OCT 18 PM 1:28

REC'D FILED
CAMERON S. BURKE

CLERK IDAHO

8 IN THE UNITED STATES BANKRUPTCY COURT
 9 FOR THE DISTRICT OF IDAHO
 10 - - - - -

11 In Re:)	Case No. 99-41532
)	(Chapter 12)
12 LEO "BRUCE" ROBBINS and)	<u>EX-PARTE MOTION FOR ORDER</u>
13 HEIDI ROBBINS,)	<u>TO SHORTEN TIME UNDER</u>
)	<u>RULE 2002(a)</u>
14 Debtors.)	
	- - - - -	

15
 16 COME NOW, the debtors in the above-entitled matter by and
 17 through their attorney of record, Brent T. Robinson of the firm Ling
 18 & Robinson, and move this Court on an ex-parte basis to shorten the
 19 time required for notice to be given to the parties in interest of
 20 the hearing on the 29th day of October, 2001.

21 Debtors' Motion to Modify Confirmed Chapter 12 Plan and
 22 Order Confirming the Plan has been filed, and it is necessary to
 23 shorten the time required for giving notice of the hearing on
 24 approval thereof. Failure to expedite such hearing will result in
 25 excessive cost and delays to debtors and subsequent losses affecting
 all parties in interest.

26 The basis for granting this Motion is to allow the
 27 operation to continue without further prejudice to its operation.

1 That if additional funds are required to be paid to KeyBank in
2 excess of what is provided herein, that it will jeopardize the
3 operation unless a hearing can be heard. That the only party being
4 effected is KeyBank and KeyBank has been informed on more than one
5 occasion that such a motion may be forthcoming. If the matter is
6 not heard on the 29th day of October, 2001, it will result in undue
7 prejudice to the debtors and all parties in interest.

8 WHEREFORE, debtors in possession moves this Court for
9 issuance of an order shortening the time required for giving notice
10 of the hearing, and that such hearing be held on the 29th day of
11 October, 2001, at 10:00 a. m. in Twin Falls, Idaho.

12 DATED this 17th day of October, 2001.

13 LING & ROBINSON

14
15 By: B. T. Robinson

16 Brent T. Robinson
17 Attorneys for Debtors
18
19
20
21
22
23
24
25
26
27
28